1	Ramon Rossi Lopez (admitted pro hac vice)
2	(CA Bar No. 86361) LOPEZ McHUGH LLP
3	100 Bayview Circle, Suite 5600 Newport Beach, CA 92660
	rlopez@lopezmchugh.com
4	Mark S. O'Connor (011029)
5	BEUS GILBERT PLLC 701 N 44th Street
6	Phoenix, AZ 85008 Telephone: 480.429-3019
7	moconnor@beusgilbert.com
8	Attorneys for Plaintiffs
9	James R. Condo (#005867) Kristine L. Gallardo (033975)
10	SNELL & WILMER L.L.P. One Arizona Center
11	400 E. Van Buren, Suite 1900 Phoenix, AZ 85004-2202
12	Telephone: 602.382.6000
13	Facsimile: 602.382.6070 jcondo@swlaw.com
14	kgallardo@swlaw.com
15	Richard B. North, Jr. (admitted <i>pro hac vice</i> ) Georgia Bar No. 545599
16	Matthew B. Lerner (admitted <i>pro hac vice</i> ) Georgia Bar No. 446986
17	NELŠON MULLINS RILEY & SCARBOROUGH LLP
	201 17th Street, NW / Suite 1700
18	Atlanta, GA 30363 Telephone: 404.322.6000
19	Facsimile: 404.322.6050 richard.north@nelsonmullins.com
20	matthew.lerner@nelsonmullins.com
21	Attorneys for Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc.
22	UNITED STATES DISTRICT COURT
23	DISTRICT OF ARIZONA
24	IN RE: Bard IVC Filters Products Liability Litigation,  No. 2:15-MD-02641-DGC
25	THE PARTIES' UPDATED REPORT CONCERNING PROFILE
26	FORMS
27	
28	

In an order dated August 7, 2019 (Doc. 19874), the Court directed those Track 3 Plaintiffs who had not filed a proper Plaintiffs' Profile Form ("PPF") to do so on or before August 22, 2019. The Court then directed the parties to submit an updated report concerning those cases in which no proper PPF had yet to be filed.

On August 29, 2019, the Parties filed "The Parties Updated Report Concerning Profile Forms" (Doc. No. 19936) and included an amended Exhibit "K," which included an updated list of those cases in which a Plaintiff still has not submitted a proper PPF. Prior to the Court's August 7th order, the Plaintiffs in several of these cases had requested an extension to file the PPF, to which the Defendants had agreed. Therefore, as contemplated by the Parties' previous submission, the Parties are filing the attached amended Exhibit K to update the Court on the present status of the profile forms in those cases. The Defendants believe the cases identified in amended Exhibit "K" as still having no proper profile forms should be dismissed. If the Court would prefer that a separate motion be filed, Defendants stand ready to do so. Plaintiffs co-lead counsel respectfully request that counsel of record for each case listed on amended Exhibit "K" be entitled the opportunity to respond to a separate motion before their case is dismissed.

Respectfully submitted, this 4th day of September, 2019.

## LOPEZ McHUGH, LLP

NELSON MULLINS RILEY & SCARBOROUGH LLP

20	By: <u>s/ Ramon Rossi Lopez</u>
	Ramon Rossi Lopez
21	(admitted <i>pro hac vice</i> )
	CA Bar No. 86361
22	LOPEZ MCHUGH LLP
	100 Bayview Circle, Suite 5600
23	Newport Beach, California 92660
	*

Mark S. O'Connor (011029) BEUS GILBERT PLLC 701 N 44th Street Phoenix, Arizona 85008

Attorneys for Plaintiffs

By: s/Richard B. North
Richard B. North, Jr. (admitted pro hac vice)
Georgia Bar No. 545599
Matthew B. Lerner (admitted pro hac vice)
Georgia Bar No. 446986
NELSON MULLINS RILEY &
SCARBOROUGH LLP
201 17th Street, NW / Suite 1700
Atlanta, GA 30363

James R. Condo (005867) Kristine L. Gallardo (033975) SNELL & WILMER L.L.P. One Arizona Center 400 E. Van Buren, Suite 1900 Phoenix, Arizona 85004-2202

28

24

25

26

27

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

Attorneys for C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. **CERTIFICATE OF SERVICE** I hereby certify that on September 4, 2019, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record. /s/ Richard B. North